

# FRANZ INC.

## Memo

**To:** Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**From:** Richard Franz

**Date:** 1/30/2015

**Re:** EB Docket No. 06-36 / CPNI Certificate for Franz Inc.

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Please find enclosed the annual CPNI Certification filing for Franz, Inc. (Filer ID: 822766).

Please don't hesitate to call me at 303.245.0209 if you have questions or comments regarding the enclosed material.

Best Regards,



Richard Franz

President

January 30, 2015

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

**Annual 64.2009(e) CPNI Certification**

Date filed: **January 30th, 2015**

Name of company covered by this certification: **Franz, Inc.**

Form 499 Filer ID: **822766**

Name of signatory: **Richard Franz**

Title of signatory: President

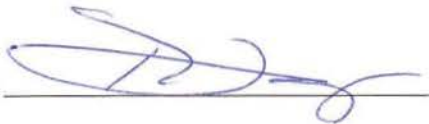
I, Richard Franz, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules [ Attachment – A ].

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed

A handwritten signature in blue ink, appearing to be 'Richard Franz', written over a horizontal line.

Richard Franz  
Franz, Inc.  
President

Attachment – A

**Accompanying Statement to Annual CPNI Compliance Certificate for  
Franz, Inc.  
ID: 822766**

Franz, Inc. operates with the following procedures to ensure that the company is in compliance with 47 C.F.R. Part 64, Subpart U, as follows:

**Employee Training and Discipline**

Franz, Inc trains and obligates all employees, sub contractor and sales agents with access to Customer Proprietary Network Information (CPNI) , to protect the confidentiality of CPNI by requiring compliance with Franz, Inc.'s Customer Proprietary Network Information Policy ( the "Policy").

Franz, Inc. requires all employees, sub contractors and sales agents with access to CPNI to confirm receipt of the Policy that they have read and understand the Policy. Failure to follow the Policy may result in disciplinary action or termination of employment.

**Sales and Marketing Campaign Approval**

Since March of 2004, Franz, Inc. no longer actively markets telecommunications services to the public. However, if this status changes all new sales and/or marketing campaigns will require executive management approval.

In addition, Franz, Inc operating Policy strictly forbids selling CPNI data to third-party entities for the purpose of sales or marketing.

**Data Maintenance Requirements**

Franz, Inc. implemented a system by which Customer's CPNI can be established prior to the use of CPNI.

Franz, Inc. requires that Customer's CPNI status data and records be maintained for a minimum of one (1) year.

**Review Process**

Franz, Inc requires Executive review and approval of any CPNI release or disclosure.

**Customer Approval and Customer Authentication Method**

Franz, Inc. will only release and/or disclose CPNI to an authorized customer contact directly, upon receiving a written request from customer that has been authenticated. Franz, Inc. requires verification for any customer's request pertaining to CPNI and will not release CPNI directly to a third-party.

Attachment – A -continued

**Accompanying Statement to Annual CPNI Compliance Certificate for  
Franz, Inc.  
ID: 822766**

**Notice to Law Enforcement and Customers of Unauthorized Access**

Franz, Inc. has established procedures under which the appropriate law enforcement agency is notified of any unauthorized access to a customer's CPNI. In addition, Franz, Inc. ensures that all records of any discovered CPNI breaches will be kept for a minimum of two (2) years.

**Customer Notification**

Franz, Inc. will notify our customers of any Change to their CPNI. At minimum, Franz, Inc. will notify a customer in the following circumstances:

- Account record change or creation
- Service related changes
- Changes to authentications system
- Inquiry regarding their CPNI from third-party, government agency or carrier

**Compliance Certificates**

Franz, Inc. executed a statement, signed by Richard Franz, certifying that he has personal knowledge that Franz, Inc. has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations

Franz, Inc. has prepared and will maintain this Accompanying Statement detailing how operating procedures ensure compliance with CPNI regulations.

Franz, Inc. will provide a summary of all customers complaints received concerning unauthorized release of CPNI and/or provide an explanation of any future actions taken against data brokers on an annual basis.

I hereby agree to Franz, Inc. CPNI procedures:

A handwritten signature in blue ink, appearing to read 'Richard Franz', is written over a horizontal line.

Richard Franz  
President